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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

10 LISA A. BRYANT, : Case No.: 2:20-cv-00594-JAD-EJY
11 Plaintiff, :
12 v. :
13 MADISON MANAGEMENT SERVICES, : ~~[PROPOSED] STIPULATION AND~~
14 LLC, and WALDMAN & PORRAS, PLLC, : ORDER TO STAY DISCOVERY AND
15 Defendants. : SCHEDULE SETTLEMENT
16 : CONFERENCE
17 :
18 : [FIRST REQUEST]

Pursuant to Local Rule 16-5, Plaintiff, Lisa Bryant, and Defendants, Madison Management Services, LLC, and Waldman & Porras, PLLC, (collectively known as the “Parties) by and through their attorneys, hereby stipulate to stay all discovery deadlines and other deadlines in the February 1, 2021 Scheduling Order (ECF No. 39) for 60 days pending mediation and settlement discussions.

1. Completed Discovery.

The parties have exchanged initial disclosures. Parties have served written discovery.

2. Remaining Discovery.

Written discovery responses from Plaintiff and the parties' depositions.

1 3. **Good Cause.**
2

3 The parties believe that this case is ripe for mediation at this time and are seeking a 60-day
4 stay all discovery deadlines and other deadlines. This stipulation is made in good faith, is not
5 interposed for delay, and is not filed for an improper purpose. Furthermore, a trial date has not
6 been set at this time.

7 4. **Current Discovery Deadlines.**
8

9 • Discovery Cutoff: **June 5, 2021**
10 • Deadline to Amend Pleadings: **March 17, 2021**
11 • Deadline to Disclose Initial Expert Disclosures: **April 16, 2021**
12 • Deadline to Disclose Rebuttal Expert Disclosures: **May 17, 2021**
13 • Dispositive Motion Deadline: **July 15, 2021**
14 • Joint Proposed Pretrial Order: **August 16, 2021**

15 5. **Proposed Discovery Deadlines.**
16

17 • Discovery Cutoff: **August 5, 2021**
18 • Deadline to Amend Pleadings: **May 17, 2021**
19 • Deadline to Disclose Initial Expert Disclosures: **June 16, 2021**
20 • Deadline to Disclose Rebuttal Expert Disclosures: **July 17, 2021**
21 • Dispositive Motion Deadline: **September 15, 2021**
22 • Joint Proposed Pretrial Order: **October 16, 2021**

23 WHEREAS, no prejudice will occur to this Court or the Parties if granted, good cause
24 supports this request to extend discovery;

25 NOW, THEREFORE, in consideration of the foregoing, and for good cause, IT IS
26 HEREBY STIPULATED AND AGREED, by and between the Parties as follows:

27 The February 1, 2021 Scheduling Order shall be amended as follows:
28

1 • Discovery Cutoff: **August 5, 2021**
2 • Deadline to Amend Pleadings: **May 17, 2021**
3 • Deadline to Disclose Initial Expert Disclosures: **June 16, 2021**
4 • Deadline to Disclose Rebuttal Expert Disclosures: **July 17, 2021**
5 • Dispositive Motion Deadline: **September 15, 2021**
6 • Joint Proposed Pretrial Order: **October 16, 2021**
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8 •

8 NOW, THEREFORE, in consideration of the foregoing, and for good cause, IT IS

9 HEREBY STIPULATED AND AGREED, by and between the Parties that this matter shall be
10 scheduled for Court Mediation/Settlement Conference on a future date selected by the Court that
11 is at least 30-days from the filing of this Stipulation and Order to Stay Discovery and Schedule
12 Settlement Conference.

14
15
16 **IT IS SO STIPULATED.**
17

18 DATED: February 22, 2021
19
20 FREEDOM LAW FIRM, LLC

21 By: /s/ George Haines
22 GEORGE HAINES, ESQ.
23 Nevada Bar No.: 9411
24 8985 S. Eastern Ave., Suite 350
25 Las Vegas, NV 89123
26 *Attorney for Plaintiff*
27 LISA BRYANT

21 DATED: February 22, 2021
22
23 WALDMAN & PORRAS, PLLC

24 By: /s/ Nicholas M. Porras
25 NICOLAS M. PORRAS, ESQ.
26 Nevada Bar No.: 12849
27 201 West Liberty Street, Suite 207
28 Reno, NV 89501
29 *Attorney for Defendants*
30 MADISON MANAGEMENT SERVICES,
31 LLC, AND PORRAS, PLLC

ORDER GRANTING

STIPULATION TO EXTEND DISCOVERY

In consideration of the parties' stipulation and good cause showing, **IT IS ORDERED**
THAT the February 1, 2021 Scheduling Order shall be amended as follows:

- Discovery Cutoff: **August 5, 2021**;
- Deadline to Amend Pleadings: **May 17, 2021**;
- Deadline to Disclose Initial Expert Disclosures: **June 16, 2021**;
- Deadline to Disclose Rebuttal Expert Disclosures: **July 17, 2021**;
- Dispositive Motion Deadline: **September 15, 2021**; and
- Joint Proposed Pretrial Order: **October 16, 2021**.

IT IS FURTHER ORDERED that the Court will issue a separate order scheduling the settlement conference.

IT IS SO ORDERED.

Elayna J. Zouachah
UNITED STATES MAGISTRATE JUDGE

Dated: February 25, 2021